

EPA-839

**Marilyn
Ginsberg/DC/USEPA/US**

04/02/2012 05:17 PM

To Nicole Owens

cc Reid Rosnick

bcc

Subject Subpart W Final Agency review

Hello Ms. Owens,

I am representing OW on the Subpart W workgroup. I have spoken with my branch chief, Ronald Bergman, and he agrees with me that OW has no comments or issues to be addressed with regard to the document.

Thank you,
Marilyn

Reid Rosnick

[Hi Marilyn, I appreciate the fact that your office...](#)

03/30/2012 07:18:52 AM

From: Reid Rosnick/DC/USEPA/US
To: Marilyn Ginsberg/DC/USEPA/US@EPA
Date: 03/30/2012 07:18 AM
Subject: Re: Subpart W Final Agency review

Hi Marilyn,

I appreciate the fact that your office might not have comments. You are the only representative from OW on the workgroup. The FAR process works as follows:

Nicole Owens of OPEI's Regulatory Management Division (RMD) will chair the FAR meeting and distribute a memorandum following the meeting that documents all positions provided and any further action agreed upon at the meeting.

Each lead workgroup member is expected to represent the position of his or her Assistant/Associate/Regional Administrator (AA or RA) at FAR (so you will need to brief your management), and may take one of the following three positions:

- 1). If an office has minor, *non-substantive comments*, they may **concur without comment**.
- 2). If an office has *substantive comments*, they may **concur with comment**. While the lead program should try to resolve the issue(s) raised by the comments, it may choose to go forward to OMB for review, or to the Administrator for signature, without resolving the issues. The lead office is responsible for working with all of the offices that provided substantive comments to determine how to address the comments. If the offices cannot agree on a way to address the comments, the lead office must include the comments in the action memorandum with an explanation of why it cannot satisfactorily address the comments.
- 3). If an office feels that *a major issue remains unresolved* (e.g., the action lacks legal authority or conflicts with other EPA rules or policies), it may **non-concur**. Non-concurrence indicates that the AA or RA objects to the action being forwarded to OMB, or to the Administrator for signature.

If a participating Office or Region is not represented at the FAR meeting and has not previously contacted the Workgroup Chair and Nicole Owens in writing with his or her AA's or RA's position prior to the meeting, "concurrence without comment" will be assumed.

I have attached the FAR announcement memo that was distributed with the meeting invitation that outlines the process in more detail. Please let me know if you have additional questions. Thanks

Reid

[attachment "FAR Memo -- Subpart W.pdf" deleted by Marilyn Ginsberg/DC/USEPA/US]

Reid J. Rosnick
Radiation Protection Division (6608J)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460
202.343.9563
rosnick.reid@epa.gov

Marilyn Ginsberg

Hi Reid, I'm pretty sure that my Office (OGW...

03/29/2012 07:15:55 PM

From: Marilyn Ginsberg/DC/USEPA/US
To: Reid Rosnick/DC/USEPA/US@EPA
Date: 03/29/2012 07:15 PM
Subject: Subpart W Final Agency review

Hi Reid,

I'm pretty sure that my Office (OGWDW) won't have any comments. I'm looking at one final doc from you and then I'll let my management know what I think. Three questions, please, it appears that the April 19 meeting is for workgroup members, but when is the meeting for senior managers? Also, if we have no comments and no need to have a senior manager involved, how do I formally let the right person know? Lastly, is there another OW workgroup member, one from another office in OW?

Thanks, Marilyn